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5 Attorneys for Plaintiff
6 DEBRA A. SCHULTZ

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

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12 DEBRA A. SCHULTZ,) Case No.: 2:15-cv-00804-APG-PAL
13)
Plaintiff,) STIPULATION TO EXTEND
14) BRIEFING SCHEDULE (First
vs.) Request)
15)
16)
CAROLYN W. COLVIN, Acting)
17)
Commissioner of Social Security,)
18)
Defendant
19 _____

20
21 Plaintiff Debra A. Schultz (“Plaintiff”) and defendant Carolyn Colvin,
22 Acting Commissioner of Social Security (“Defendant”), through their undersigned
23 counsel of record, hereby stipulate, subject to the approval of the Court, to extend
24 the time for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to May
25 6, 2016; and that Defendant shall have until June 6, 2016, to file her opposition, if
26 any is forthcoming. Any reply by plaintiff will be due June 27, 2016.

1 An extension of time for plaintiff is needed in order to properly prepare
2 plaintiff's motion addressing the legal issues within the administrative record in
3 this matter. Counsel sincerely apologizes to the court for any inconvenience this
4 may have had upon it or its staff.

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7 DATE: March 22, 2016,

Respectfully submitted,

8 ROHLFING & KALAGIAN, LLP

9 */s/ Marc V. Kalagian*

10 BY: _____

Marc V. Kalagian

11 Attorney for plaintiff DEBRA A. SCHULTZ

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13 DATED: March 22, 2016

Daniel G. Bogden

14 United States Attorney

15 */S/ April A. Alongi

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17 _____
April A. Alongi

18 Special Assistant United States Attorney

19 Attorney for Defendant

[*Via email authorization]

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21 IT IS SO ORDERED:

22
23 *Jerry A. Feen*
24 _____
UNITED STATES MAGISTRATE JUDGE

25 DATED: March 25, 2016